

IN RE: IMAGI...
EASTMAN DISTRICT OF NEW YORK
225 ADMIRAL PHAROS
Brooklyn, New York 11201

AMON, C.J.

BLOOM, M.J.

ORIGINAL **CV 15 6698**

(DOOR MANAGE MARYANN MOYERS - D.E.A. Sp. AGT.
451 CLARKSON AVENUE
Brooklyn, New York 11203
Phone - 718-245-2241

Explains Science
(App)

Georgetown
University Science
or
medicine

Dr. RENEKAT ANATHA MOORAN - DIRECTOR OF
KINDY LOUNGE HOSPITAL CENTER PSYCHIATRY
451 CLARKSON AVENUE
Brooklyn, New York 11203
Phone - 718-245-3131

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
★ NOV 30 2015 ★
BROOKLYN OFFICE

NOV 19 2015
New York City
Brooklyn
London, England
11/19/2015-2:30-4:20 PM

MARSHALL TUNICE
1011 BLOOM

CHIEF TUDGE
CHIEF BARRY AMON

PLAINT LEE DANNY
IM-ADMISSION - 2009 TO
2015. DID NOT SIGN

Form in Emergency Room
Admission - Hospital to
Admission - OR - Medicine to
Plaintiff - Family Nurse Practitioner
Form 11/19/15

Plaintiff (MAY) Application
Fee waiver

2009-10-2015
\$800 Million Dollars in
Plaintiff - Psychiatry
Intervention

IN-FILE NUMBER - 12377/15. Motion for Dismissal
Director of Psychiatry - 11/10/15 - Affirmation in
Plaintiff Application, Needing to Supplement - (MAY)
① Court Based Psychiatry Center
② Kitchawan Psychiatry Center

FACT: BOTH HOSPITAL ARE UNDER CONVICTIONAL PROSECUTION
INTO PSYCHIATRIC MAINTENANCE IN NEW YORK STATE.

THEY BOTH ARE SUBJECTS OF PSYCHIATRIC MAINTENANCE
CIVIL LAW SUIT - IN THE UN. RES. (TRIAL) DISTRICT COURT OF THE
EASTERN DISTRICT OF NEW YORK.

THAT THE LAW FIRM.

McALCORN AND FRIEDMAN

123 Williams Street

New York, New York 10038-3804

Phone - 212-782-8700

FAX 212-227-2903

1) - THE SUBJECTS OF AN CIVIL SUIT IN THE

UN. RES. DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

13-MC-572 District Number, FOR ONE HUNDRED MILLION DOLLARS

IN RE ALD - ARE A FEW MILLION DOLLARS (ONE HUNDRED
AGAINS McALCORN AND FRIEDMAN.

LOUIS MARIE MARSHALL MEYER

LOUIS MARIE MARSHALL MEYER

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

----- x
In the Matter of the Application of the Retention of

MAURICE MAYNARD

Index No. 12377/15

Petitioner,

-against-

**AFFIRMATION IN
PARTIAL OPPOSITION**

RENUKA ANANTHAMOORTHY, M.D., Director of the
Department of Psychiatry, Kings County Hospital Center,

Respondent.
----- x

NICOLE KLEIN, an attorney duly admitted to practice law before the courts of the State of New York, affirms the following under penalty of perjury pursuant to CPLR § 2106:

1. I am an associate with the law firm of McALOON & FRIEDMAN, P.C., attorneys for defendant NEW YORK CITY HEALTH and HOSPITALS CORPORATION (referenced in the caption as RENUKA ANANTHAMOORTHY, M.D., Director of the Department of Psychiatry, Kings County Hospital Center). As such, I am familiar with the facts and circumstances herein based upon a review of the files maintained by this office.

2. This Affirmation is submitted in partial opposition to Petitioner's OTSC requesting a rehearing and review pursuant to Mental Hygiene Law §9.33.

3. Respondent does not oppose the portion of Petitioner's applicable seeking de novo rehearing of petitioner's Mental Hygiene Law matter pursuant to §9.33.

4. However, respondent respectfully requests that prior to sending this matter to the trial readiness part, that the Court so-order subpoenas for the various psychiatric hospitals (other than KCH) where the Petitioner was recently admitted. This includes South Beach Psychiatric Center and Kingsboro Psychiatric Center. It is also respectfully requested that the trial date be scheduled with consideration of the time need by the aforementioned facilities to produce said records for trial.

Exhiber A

WHEREFORE, it is respectfully requested an order be issued granting the relief requested herein as well as such other and further relief as to the Court may seem just and proper.

Dated: New York, New York
November 13, 2015

McALOON & FRIEDMAN, P.C.

By: *Nicole Klein*
NICOLE KLEIN, ESQ.

Attorneys for Respondent NYCHHC (RENUKA
ANANTHAMOORTHY, M.D., Director of the
Department of Psychiatry, Kings County Hospital
Center

Office and P.O. Address
123 William Street - 25th Floor
New York, New York 10038

Index No.: 12377 15
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

In the Matter of the Application of the Retention of
MAURICE MAYNARD

Plaintiff,

- against -

RENUKA ANANTHAMOORTHY, M.D., Director of the
Department of Psychiatry, Kings County Hospital Center,

Defendants.

AFFIRMATION IN PARTIAL OPPOSITION

McAloon & Friedman, P.C.
Attorneys for Defendant
Office and Post Office Address, Telephone
123 William Street
New York, New York 10038-3804
(212) 732-8700 (212) 227-2903

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated: November 13, 2015

Signature: Nicole Klein
Print Signer's Name: NICOLE KLEIN, ESQ.

To

Attorney(s) for

Service of a copy of the within
Dated,

is hereby admitted.

Attorney(s) for

Sir: - Please take notice

☐ Notice of Entry

that the within is a (*certified*) true copy of a _____ duly entered in
the office of the clerk of the within named court on _____ 20____

☐ Notice of Settlement

that an order _____ of which the within is a true copy will be presented
for settlement to the HON. _____ on of the judges of the
within named court, at _____ on _____ 20____
at

Dated,

Yours, etc.

McAloon & Friedman, P.C.
Attorneys for
Office and Post Office Address, Telephone
123 William Street
New York, New York 10038-3804